

October 10, 2003

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Mr. Thomas M. Dorman Kentucky Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky 40601

RE: Case No. 2003-00379

Dear Mr. Dorman:

Enclosed please find the original and ten copies of Covad Communications Company's ("Covad")First Set of Data Requests to BellSouth Telecommunications, Inc. ("BST"). Please indicate receipt of this filing by your office by placing a file stamp on the extra copy and returning to me via the enclosed, self-addressed, stamped envelope.

PUS IX CONTRACTOR

Sincerely Yours,

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Douglas F.\\Brent

Counsel to Covad Communications Company

DFB:jms

Enc.

Cc: Parties of Record

#### COMMONWEALTH OF KENTUCKY

OCT 1 0 2003

#### BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS	)
COMMISSION'S TRIENNIAL REVIEW ORDER	) CASE NO. 2003-00379 )
REGARDING UNBUNDLING REQUIREMENTS	
FOR INDIVIDUAL NETWORK ELEMENTS	)

# COVAD COMMUNICATIONS COMPANY'S FIRST SET OF DATA REQUESTS TO BELLSOUTH TELECOMMUNICATIONS, INC.

DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad") hereby serves its First Set of Data Requests on BellSouth Telecommunications, Inc. ("BellSouth").

## **DEFINITIONS**

- 1. "Line Splitting over UNE-P" refers to a network configuration where a CLEC provides an end user with circuit-switched voice service using the Unbundled Network Element ("UNE") Platform while at the same time providing that customer with Digital Subscriber Line ("DSL") data services over the High Frequency Portion of the Loop using either its own equipment or the equipment of a second CLEC.
- 2. "Line Splitting over UNE-L" refers to a network configuration where a CLEC provides an end user with circuit-switched voice service using a UNE Loop combined with a CLEC-owned switch while at the same time providing that customer with Digital Subscriber Line ("DSL") data services over the High Frequency Portion of the Loop using either its own equipment or the equipment of an additional CLEC.

## **DATA REQUESTS**

1. Has BellSouth developed a hot-cut process to migrate a single Line Splitting over UNE-P loop (where the splitter is owned by BellSouth) to a Line Splitting over UNE-L loop (where the splitter is owned by BellSouth)? If the answer to this data request is "yes,"

- a. Has BellSouth developed the Operational Support Systems (OSS) necessary to allow CLECs to order this process electronically? If not, when does BellSouth expect to have the OSS necessary to allow CLECs to order this migration process electronically?
- b. Describe the process in detail and identify what BellSouth documents, if any, describe the process and where those documents can be found.
- 2. Has BellSouth developed a hot-cut process to migrate a single Line Splitting over UNE-P loop (where the splitter is owned by a CLEC) to a Line Splitting over UNE-L loop (where the splitter is owned by a CLEC)? If the answer to this data request is "yes,"
  - c. Has BellSouth developed the Operational Support Systems (OSS) necessary to allow CLECs to order this process electronically? If not, when does BellSouth expect to have the OSS necessary to allow CLECs to order this migration process electronically?
  - d. Describe the process in detail and identify what BellSouth documents, if any, describe the process and where those documents can be found.
- 3. Has BellSouth developed a hot-cut process to migrate a single Line Splitting over UNE-P loop (where the splitter is owned by a BellSouth) to a Line Splitting over UNE-L loop (where the splitter is owned by a CLEC)? If the answer to this data request is "yes,"
  - e. Has BellSouth developed the Operational Support Systems (OSS) necessary to allow CLECs to order this process electronically? If not, when does BellSouth expect to have the OSS necessary to allow CLECs to order this migration process electronically?
  - f. Describe the process in detail and identify what BellSouth documents, if any, describe the process and where those documents can be found.
- 4. Has BellSouth developed a batch hot-cut process to migrate groups of Line Splitting over UNE-P loops (where the splitter is owned by BellSouth) to Line Splitting over UNE-L Loops (where the splitter is owned by BellSouth)? If the answer to this data request is "yes,"
  - g. How many loops per day can the process accommodate in a single Central Office?
  - h. What training have BellSouth employees received to allow them to follow the process?
  - i. How many BellSouth employees have received such training?

- j. In what percentage of Kentucky Central Offices are there BellSouth employees who have received such training?
- k. Has BellSouth developed the Operational Support Systems (OSS) necessary to allow CLECs to order this process electronically? If not, when does BellSouth expect to have the OSS necessary to allow CLECs to order this migration process electronically?
- 1. Describe the process in detail and identify what BellSouth documents, if any, describe the process and where those documents can be found.
- 5. Has BellSouth developed a batch hot-cut process to migrate groups of Line Splitting over UNE-P loops (where the splitter is owned by a CLEC) to Line Splitting over UNE-L Loops (where the splitter is owned by a CLEC)? If the answer to this data request is "yes,"
  - m. How many loops per day can the process accommodate in a single Central Office?
  - n. What training have BellSouth employees received to allow them to follow the process?
  - o. How many BellSouth employees have received such training?
  - p. In what percentage of Kentucky Central Offices are there BellSouth employees who have received such training?
  - q. Has BellSouth developed the Operational Support Systems (OSS) necessary to allow CLECs to order this process electronically? If not, when does BellSouth expect to have the OSS necessary to allow CLECs to order this migration process electronically?
  - r. Describe the process in detail and identify what BellSouth documents, if any, describe the process and where those documents can be found.
- 6. Has BellSouth developed a batch hot-cut process to migrate groups of Line Splitting over UNE-P loops (where the splitter is owned by BellSouth) to Line Splitting over UNE-L Loops (where the splitter is owned by a CLEC)? If the answer to this data request is "yes,"
  - s. How many loops per day can the process accommodate in a single Central Office?
  - t. What training have BellSouth employees received to allow them to follow the process?
  - u. How many BellSouth employees have received such training?

- v. In what percentage of Kentucky Central Offices are there BellSouth employees who have received such training?
- w. Has BellSouth developed the Operational Support Systems (OSS) necessary to allow CLECs to order this process electronically? If not, when does BellSouth expect to have the OSS necessary to allow CLECs to order this migration process electronically?
- x. Describe the process in detail and identify what BellSouth documents, if any, describe the process and where those documents can be found.
- 7. If the answer to any of Data Requests 1 through 6 is "no" or anything other than an unqualified "yes," for the process referred to in each such Data Request:
  - a. When does BellSouth expect to have such a process ready for use by CLECs?
  - b. If the Data Request seeks information on a batch process, how many loops per day per Central Office do you expect the process to migrate?
  - c. When will the process have OSS associated with it that will allow electronic ordering by CLECs?

Respectfully submitted,

Charles (Gene) Watkins
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## **CERTIFICATE OF SERVICE**

This is to certify that I have this 10<sup>th</sup> day of October, 2003 caused to be served by United States mail a copy of the within and foregoing Data Requests upon the following persons, properly addressed as follows:

Douglas F. Brent

Stephen R. Byars Vice President – External Affairs ALLTEL Communications, Inc P.O. Box 1650 Lexington, Kentucky 40588-1650

Dorothy Chambers Regulatory & External Affairs BellSouth Telecommunications, Inc. 601 West Chestnut Street, Room 410 P.O. Box 32410 Louisville, Kentucky 40232 Hon. Ann Louise Cheverout Office of the Attorney General Utility & Rate Intervention Division 1024 Capital Center Drive Suite 200 Frankfort, Kentucky 40601-8204

Jouett Kinney Cincinnati Bell 201 East 4<sup>th</sup> Street Building 103-1610 Cincinnati, Ohio 45201